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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Nina Fuentes, individually,

Plaintiff,

vs.

Dave and Buster's of Nevada, LLC; and Does 1-50,
Roe Corporations 51-100, inclusive,

Defendant.

Case No.: 2:25-cv-512

**Stipulation and Order to Extend
Discovery (First Request)**

I. Summary of Discovery Completed

- a. All parties have served FRCP 26(a)(1) disclosures.
- b. Defendant served written discovery requests which Plaintiff has responded to. Plaintiff has recently served written discovery requests to Defendant with responses pending.
- c. Defendant subpoenaed Depositors Insurance Company for its records surrounding a prior motor vehicle accident involving Plaintiff. Defendant then disclosed Depositors Insurance Company's materials to Plaintiff.
- d. Defendant subpoenaed Gallagher Bassett for its records surrounding a prior motor vehicle accident involving Plaintiff. Defendant then disclosed Gallagher Bassett's materials to Plaintiff.

e. Defendant currently has eighteen pending medical records requests for Plaintiff's treating providers.

II. Discovery Remaining

a. Responses to written discovery described above.

b. Depositions of parties.

c. Depositions of treating physicians.

d. Expert witness designations.

e. Depositions of expert witnesses.

f. Other discovery as needed.

III. Why the Remaining Discovery Could not be Completed

The case was removed on March 20, 2025. The parties agreed to the standard 180-day discovery period calculated from the removal. While the parties have made meaningful progress in gathering information related to this case, significant material facts remain to be gathered. The most pertinent to Defendant independently pursuing Plaintiff's medical records. Defendant has recently discovered additional medical providers that have been requested as of June 5, 2025, and are currently pending responses. Both sides want to gather further facts before starting depositions or preparing for expert disclosures.

IV. Proposed Schedule for Completing All Remaining Discovery

	Current Deadline	Proposed Deadline
Amending Pleadings and Adding Parties	June 17, 2025	August 18, 2025
Initial Expert Disclosures	July 17, 2025	September 15, 2025
Rebuttal Expert Disclosures	August 18, 2025	October 17, 2025
Discovery Closes	September 15, 2025	November 14, 2025
Dispositive Motions	October 15, 2025	December 15, 2025
Pre-Trial Order, if no Dispositive Motions	November 14, 2025	January 13, 2026



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IT IS SO ORDERED.

A handwritten signature in blue ink, reading 'E. J. Zouchal', written over a horizontal line.

UNITED STATES MAGISTRATE JUDGE

Dated: June 25, 2025